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May 17, 1983

Ecology and Environment, Inc.
New Brotherhood Building
8th and State - Suite 374
Kansas City, KS 66101

Attention: Mr. William Kwoka

Dear Mr. Kwoka:

On May 9, 1983 you visited our ACF Amcar, St. Louis Plant and met with Don Pulliam, Plant Manager, and other ACF representatives for the purpose of inspecting and discussing the registered hazardous waste site (i.e., stencil wash area). In the course of discussion, you requested that certain information be provided concerning the types and quantities of solvents involved.

The following information has been developed concerning the history and use of the outdoor stencil wash at our St. Louis Plant. This information has been developed through discussion with present and former employees.

The form submitted to the EPA - Notification of Hazardous Waste Site, dated June 8, 1981, indicated the site in use from 1970 thru 1981. There was apparently some misunderstanding because the same stencil wash area was in use prior to 1970. As best we can determine, 1970 was the time when the current stencil wash rack was constructed. Prior to 1970, there were other similar "A-frame" structures in use. The Paint Shop was built in 1941. It is believed stencil washing in the area in question began in the mid-1940's and we are using 1945 as our best estimate.

From 1945 thru 1965 VM&P Naptha was used to clean stencils. Estimates are 50 to 100 gallons used per day with an average of 70 gallons. Approximately 60%, or 42 gallons caught and recirculated with the remaining 40%, or 28 gallons lost through evaporation or spills. Concerning the 28 gallons, estimates are 90% lost through evaporation and 10%, or 2.8 gallons spilled on each production day. These quantity estimates presume plant running a maximum of 30 cars per production day.

From 1966 thru 1975 trichloroethylene was used to clean stencils. Estimate the same quantities would be applicable and, therefore, the same spillage of 2.8 gallons per production day.

From 1976 thru 1978 perchloroethylene was used. Again, would continue to use the same quantities and spillage of 2.8 gallons per production day.

From 1979 thru 1981 a mixture containing methylene chloride was in use. Same quantities and spillage rate of 2.8 gallons per production day.

As noted previously, the estimated solvent use and spill quantities are based on a 30-car per day production rate. During the period 1945 thru 1981 the plant shipped 130,981 cars. At 30 cars per day, this equates to 4366 production days. Using the estimated spillage rate of 2.8 gallons per production day, this equals a total of 12,225 gallons over a 36 year period.

Looking at the individual time periods, estimates can be made of the gallons of each type solvent spilled:

1945 - 1965	-	69,473 Cars produced
VM&P Naptha		2,316 Equivalent production days at 30 cars per day
		6,485 Total gallons at 2.8 gallon spill rate
1966 - 1975	-	39,927 Cars produced
Trichloroethylene		1,331 Equivalent production days at 30 cars per day
		3,727 Total gallons at 2.8 gallon spill rate
1976 - 1978	-	10,977 Cars produced
Perchloroethylene		366 Equivalent production days at 30 cars per day
		1,025 Total gallons at 2.8 gallon spill rate
1979 - 1981	-	10,604 Cars produced
Mixture of:		354 Equivalent production days at 30 cars per day
Toluene - 40%		
Acetone - 30%		992 Total gallons at 2.8 gallon spill rate
Methanol - 15%		
Methylene Chloride - 15%		

As a matter of further information, in 1963 extensive excavation was done along the North side of the Paint Shop for an addition to the building. Excavation approximately 10' wide x 10' deep - there was no visible indication of soil contamination.

In 1979 again excavation in adjoining area for an air compressor foundation. Excavation approximately 10' square x 10' deep. Core sample taken at the same time to bed rock at 38' with no visible indication of soil contamination.

This information is being submitted for use in the preparation of your report. We would appreciate a copy of your findings.

Very truly yours,

G. L. Harting
Director, Manufacturing
Engineering

GLH:vg